

In the United States Bankruptcy Court  
For the District of Maryland  
Baltimore Division

In re: (

Robert Daniel Wallace ( Bankr. Case No.: 23-10737-NVA

Debtor(s) ( (Chapter 7)

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Lakeview Loan Servicing, LLC (

Movant (

v. (

Robert Daniel Wallace (

Respondents (

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**OPPOSITION TO MOTION FOR RELIEF FROM STAY**

Zvi Guttman, Trustee, hereby files this Opposition to the Motion Seeking Relief from Stay [Dkt 31] filed by Lakeview Loan Servicing, LLC (Movant) as to 2601 Golf Island Rd., Ellicott City, MD 21042 ("Property"), and states:

1. The Trustee admits the allegations of Paragraphs 1 - 4 of the Motion.
2. The documents referred to in Paragraphs 5 - 7 of the Motion speak for themselves.
3. The Trustee is without sufficient knowledge to admit or deny the truth of Paragraphs 8 and 9 of the Motion.
4. The Trustee denies the allegations of Paragraphs 10 - 12 of the Motion.

**In further answer to the Motion the Trustee states as follows.**

5. Schedules A/B and D reflect equity in the Property.
6. Zillow.com (\$1,377,200), Realtor.com (\$1,359,210), Trulia.com (\$1,377,200), Redfin.com (\$1,398,000), and others reflect significant equity in the Property.

7. Although he has been stymied by the Debtor's ex-spouse who occupies the Property, the Trustee is attempting to market and sell the Property. Toward that end, on June 9, 2023, the Trustee filed a motion seeking access to the Property to allow for his real estate professional to ascertain its value. If the value supports it, the Trustee will promptly list the Property for sale.

8. Movant will not be harmed at all by a continuation of the stay as if it is entitled to the proceeds of sale it will receive the same amount whether or not the Property is sold by the Trustee or the Movant but in the case of the former, quicker and with less costs.

WHEREFORE, Zvi Guttman, Trustee, moves that the Motion be denied and that he be granted such other and further relief as is just and proper.

/s/ Zvi Guttman

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